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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E.T.I. EURO TELECOM INTERNATIONAL,
N.V.,

Plaintiff,

V.

REPUBLIC OF BOLIVIA, and EMPRESA
NACIONAL DE TELECOMUNICACIONES
ENTEL S.A.,

Defendants.

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: Case No. 08-cv-4247 (LTS)(FM)
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**NOTICE OF MOTION FOR AN AWARD
OF ATTORNEY'S FEES AND COSTS**

PLEASE TAKE NOTICE that pursuant to New York CPLR §6212 and the Court's July 30, 2008 Memorandum Opinion and Order, the Republic of Bolivia hereby moves the Court, the Honorable Laura Taylor Swain, Presiding, at the United States Courthouse, 500 Pearl Street, New York, New York, for an award of attorney's fees and costs covering the period May 9, 2008 through August 24, 2008. The amount of the award Bolivia seeks is set forth in the Declaration of Paul S. Reichler, including the attachments thereto, and the Memorandum of Law submitted contemporaneously herewith.

In addition to the amounts stated, Bolivia also seeks an award of fees and costs for any additional sums incurred subsequent to August 24, 2008 through the date on which the attached funds belonging to Entel are returned to it and final judgment dismissing this action has been entered.

In support of this Motion, Bolivia relies upon the above-referenced Declaration of Paul S. Reichler, the attachments thereto, and the Memorandum of Law submitted simultaneously herewith, together with all its prior submissions and the prior proceedings in this matter.

As stated in the Court's July 30, 2008 Opinion and Order, Plaintiff ETI's response to this Motion is due by September 5, 2008, and Bolivia's Reply will be due by September 12, 2008.

Dated: August 25, 2008

Respectfully submitted,

FOLEY HOAG LLP

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